

MATT JOHNSON, PLUMBERS &
STEAMFITTERS LOCAL NO. 43
HEALTH AND WELFARE FUND, and
PLUMBERS & STEAMFITTERS LOCAL
NO. 43 PENSION FUND,

Case No. 3:23-cv-00273

Judge Trauger

Defendants.

Pursuant to the Agreed Protective Order, (Order, ECF No. 35), between Defendants Crane Nuclear PFT Corp. and Chris Mitchell (“Defendants”) and Plaintiffs Matt Johnson, Plumbers & Steamfitters Local No. 43 Health and Welfare Fund, and Plumbers & Steamfitters Local No. 43 Pension Fund, Defendants’ respectfully move the Court for leave to file certain documents under seal as follows:

- Pursuant to § 5.07 of the Middle District of Tennessee’s User Manual for the ECF System, this document will be filed by separate entry as “Sealed Documents” to await the Court’s determination whether such documents should continue to be treated as confidential.

Respectfully submitted,

/s/ Sarah V. Belchic

Sarah V. Belchic (Bar No. 0037500)

LITTLER MENDELSON, P.C.

333 Commerce Street, Suite 1450

Nashville, TN 37201

615.383.3033 (phone)

615.383.3323 (fax)

sbelchic@littler.com

Sarah Bryan Fask (PA BPR 306549)

(admitted pro hac vice)

LITTLER MENDELSON, P.C.

1601 Cherry Street, Suite 1400

Philadelphia, PA 19102

267.402.3000

sfask@littler.com

Counsel for Defendants

Crane Nuclear PFT Corp. and Chris Mitchell

CERTIFICATE OF SERVICE

I hereby certify on December 19, 2024, the foregoing was filed electronically through the ECF system, is available for viewing and downloading from the ECF system and will be sent electronically to the registered participants identified on the Notice of Electronic Filings, including Defendants' counsel of record as follows:

Karla M. Campbell
R. Jan Jennings
Michael Iadevaia
Stranch, Jennings & Garvey, PLLC
223 Rosa L. Parks Avenue Suite 200
Nashville, TN 37203
kcampbell@stranchlaw.com
jjennings@stranchlaw.com
miadevaia@stranchlaw.com

and

Cameron Hill
Baker Donelson
633 Chestnut St #1900
Chattanooga, TN 37450
chill@bakerdonelson.com

Louis J. Cannon, Jr.
Baker Donelson (MD)
100 Light Street, 19th Floor
Baltimore, MD 21202
lcannon@bakerdonelson.com

/s/ Sarah V. Belchic
Sarah V. Belchic